

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN GRANGER,

Plaintiff,

- against -

GILL ABSTRACT CORPORATION and NAN
GILL,

Defendants.

Civ. Action No. 07-CV-3491(PKC)

AFFIDAVIT OF NAN GILL

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

Nan Gill, being duly sworn, deposes and says:

1. I am a Defendant in the above captioned matter and the President of Gill Abstract Corp. and accordingly have personal knowledge of the facts set forth herein. I respectfully submit this affidavit in opposition to Plaintiff John Granger's ("Plaintiff" or "Granger") motion for summary judgment and in support of Defendant Nan Gill ("Gill") and Gill Abstract Corp.'s ("Abstract") (collectively "Defendants") cross motion for summary judgment.

2. In short, it is undisputable that Plaintiff's title insurance rate calculator (the "Rate Calculator") was removed from Abstract's website several months before the June 30, 2006 registration was granted. In fact Plaintiff has offered no proof whatsoever that the Rate Calculator on Abstract's website after June 30, 2006. Accordingly, Plaintiff's claims are all

without merit, and Plaintiff's complaint must be stricken. At the very least, Plaintiff's damages, if any, must be limited to actual damages.

3. Abstract is a title company and is engaged in the business of providing a range of title services to the general public, including but not limited to, the sale of title and mortgage insurance. Abstract's website address is www.gillabstract.com (the "Website").

4. At all material times Drew Diskin of Inertia, LLC ("Mr. Diskin") was Abstract's website administrator. At some point prior to February, 2006 I contacted Mr. Diskin to inquire about the possibility of placing a mortgage and title insurance rate insurance calculator on the Website. Mr. Diskin explained to me that it was possible to do so, and subsequently confirmed that he would add a mortgage calculator and a title insurance rate calculator to the Website.

5. At no material time did I request or authorize Mr. Diskin to place Plaintiff's Rate Calculator on the Website, nor did I know what the Rate Calculator belonged to Plaintiff. Moreover, at no time prior to February, 2006 was I aware that the Rate Calculator belonged to Plaintiff or was copyrighted in anyway.

6. On or about February 17, 2006, I received a letter from Plaintiff dated February 13, 2006, claiming that Abstract's website contained a copyrighted title insurance rate calculator (the "Rate Calculator"). A copy of this letter is attached hereto as Exhibit "A."

7. I immediately contacted Mr. Diskin and instructed him to remove the Rate Calculator. A copy of my email correspondence to Mr. Diskin dated February 19, 2006 is attached hereto as Exhibit "B." On or about February 19, 2006, I also contacted Mr. Sal Cimaglia ("Mr. Cimaglia") of SK Consulting, located at 4 Cregan Place, Monroe, New York, to install a new rate calculator on the Website.

8. On February 21, 2006, I received written confirmation from Mr. Diskin that the Rate Calculator had been removed from Abstract's website and replaced with a new rate calculator. A copy of this correspondence is attached hereto as Exhibit "C." I also received written confirmation from Mr. Cimaglia confirming that a new rate calculator had been placed on Abstract's website. A copy of this correspondence is attached hereto as Exhibit "D." Attached hereto as Exhibit "E" are copies of bills issued by SK Consulting for replacing the Rate Calculator, all of which have been paid.

9. On February 21, 2006, I wrote to Mr. Granger advising him that instructions had been given to remove the Rate Calculator. A copy of my letter is attached hereto as Exhibit "F."

10. Immediately thereafter I checked Abstract's website myself and confirmed that the Rate Calculator had been removed and that it had been replaced with a new rate calculator.

11. At no time thereafter was there any material whatsoever belonging to Plaintiff on the Website.

12. Accordingly, it is undisputable that the Rate Calculator was removed from Abstract's website on or about February 21, 2006. Certainly, the Rate Calculator was removed from the Website well before June 30, 2006 the date of registration of the Rate Calculator. A copy of the Rate Calculator's registration certificate is attached hereto as Exhibit "G."

13. Mr. Granger's claim that the Rate Calculator was not removed from the Website until August 2006 is a blatant lie. In fact, not only do Drew Diskin and Sal Cimaglia both confirm that the Rate Calculator was removed from the Website on February 21, 2006, but the internet archive "the Wayback Machine" also independently confirms this. See Affidavit of

Drew Diskin attached hereto. Moreover, Mr. Granger offers no proof whatsoever that the Rate Calculator remained on the Website after June 30, 2006.

14. I been advised by my attorneys that since the Rate Calculator was removed from Abstract's website several months before its registration was granted, Plaintiff's statutory damages claim is without merit and must be summarily dismissed.

15. Moreover, neither Abstract nor myself have profited in anyway whatsoever from the use of Plaintiff's Rate Calculator. It is absurd for Plaintiff to allege that Abstract was more profitable because of the presence of his calculator on Abstract's website, and in fact no where in Plaintiff's submissions is there any evidentiary or logical connection between the presence of Plaintiff's Rate Calculator and Defendants' profits. Client's decisions on whether to obtain title insurance from Abstract had nothing to do with the presence or absence of the Rate Calculator on Abstract's website. Accordingly, Plaintiff is not entitled to any statutory damages or damages for "lost profits."

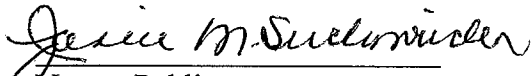
16. Defendants did not willfully or intentionally infringe any purported copyright held by Plaintiff.


17. At the very least Plaintiff's motion for summary judgment must be dismissed as being premature since discovery has not been completed.

WHEREFORE, I respectfully respect that the Court deny Plaintiff's motion for summary judgment with prejudice, and grant Defendants' cross motion for summary judgment

and grant Defendants the fees and costs associated with the defense of the instant motion for summary judgment.

Sworn to before me on this
18th day of October 2007.


Notary Public


Nan Gill

JANICE M. SUCHOWIECKI
Notary Public, State of New York
Qualified in Orange County
No. 4633500
Commission Expires June 30, 2010

John Granger

2820 Audubon Village Drive, Suite 339

Audubon, Pennsylvania 19403

<http://www.alphaadv.net/nytitle>

(610) 929-5154

John@alphaadv.net

EXHIBIT B

February 13, 2006

Gill Abstract Corporation
222 Greenwich Avenue
Goshen, NY 10924

Contract #: _____

Dear Nan Gill,

John Granger is the owner of the exclusive right to use John Granger's Copywritten New York Title Insurance Rate Calculator.

It has come to the attention of John Granger that Gill Abstract Corporation is operating a website found at URL:
http://www.gillabstract.com/abstract_title_insurance_rates_calculator.htm

Gill Abstract Corporation claims a 2006 Copyright on Gill Abstract Corporation's website.

Gill Abstract Corporation's website acknowledges the New York Title Insurance Rate Calculator is Copywritten by John Granger and that John Granger has reserved all rights.

John Granger's records do not include any licensing agreement with Gill Abstract Corporation.

Please send John Granger a copy of Gill Abstract Corporation's licensing agreement to legally use the Copywritten New York Title Insurance Rate Calculator.

Silence beyond two weeks shall serve as proof that no written licensing agreement exists between John Granger and Gill Abstract Corporation to use John Granger's Copywritten New York Title Insurance Rate Calculator.

Very truly yours,

John Granger

Yahoo! Mail - drewdiskin@yahoo.com

http://us.f565.mail.yahoo.com/ym/ShowLetter?MsgId=8041_0_59523...

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under 1.5 yrs![Previous](#) | [Next](#) | [Back to Search Results](#)[Delete](#)[Reply](#)[Forward](#)[Spam](#)[Move...](#)This message is not flagged. [\[Flag Message - Mark as Unread \]](#)[Printable View](#)**From:** nangill@gillabstract.com [Add to Address Book](#) [Add Mobile Alert](#)**To:** SKCC@aol.com**CC:** "Drew Diskin, M.S." <drew@drewdiskin.com>**Subject:** Re: Web Stuff**Date:** Sun, 19 Feb 2006 16:21:19 -0500

could not see what it looked like.

Please get in touch with Drew Diskin to set it up.

By copy of this email, I am notifying him that you will be getting in touch with him.

Thanks,

Nan

----- Original Message -----

From: SKCC@aol.com**To:** nangill@gillabstract.com**Sent:** Sunday, February 19, 2006 2:05 PM**Subject:** Web Stuff

Hi Yan..... oops....NAn

Good seeing you Friday

My programmer did save the web calculator we did a while back for you. It will be back up next Tuesday for you to look at. If you go to www accuratespda.com/gillabstract.swf you can see what it looks like. If you want to switch over to it, just give the link above to your web programmer and tell him to place it under the rate calculator button on the website. It will work immediately. I have requested Florida rates from one source and if you happen to find your rates, email them to me. I am looking into incorporating the standard rates, but not mortgage tax and transfer tax. The charge for setting up the website if you want to go with it is \$799, then \$35 a month for all updates and upgrades including any palm and pc programs you may have. If and when we do the florida rates, there would be a minor charge for installation. I also will send you a monthly printout on how many hits the rate calculator is getting from your customers and how many different customers are hitting.....

Take care

Talk to you soon

Sal

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My thoughts are with you. I hope this ordeal is over quickly for you.
I will write the letter.
Nan

----- Original Message -----

From: Drew Diskin**To:** Nan Gill**Sent:** Sunday, February 19, 2006 8:05 PM**Subject:** Re: rates calculator

Nan,

Thanks for the e-mail. I received a cease-and-assist letter, too, in the mail. Needless to say, I was less than thrilled. I believe you may need to rethink some of your strategies for forms and such in this regard. In the meanwhile, I would suggest that you contact the person who sent the letter, apologize for not knowing it was proprietary, and let him know that you are rectifying the situation. This would help prevent them from blacklisting you with any associations or large industry groups. You never quite know who people know...

I am scheduled to close on my new home in VA this week. Once that is finished, and I am not living in a hotel (and commuting 600 miles every weekend) I will have more time to dedicate to your sites. Thank you for your understanding.

Respectfully,

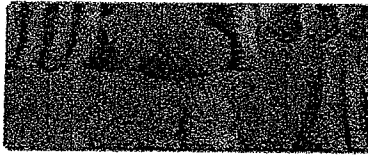
Drew

Cheers.

Drew

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Thank you

N

----- Original Message -----

From: <drew@drewdiskin.com>**To:** <nangill@gillabstract.com>**Sent:** Tuesday, February 21, 2006 9:50 PM**Subject:** Re: Fw: Web Calculator for Gill Abstract

>

> Updated.

>

> Drew

>

>

>

>> Drew

>> Please get this one up as quickly as possible and the other one off.

>> Thank you,

>> Nan

>> ----- Original Message -----

>> **From:** SKCC@aol.com>> **To:** nangill@gillabstract.com>> **Cc:** drew@drewdiskin.com>> **Sent:** Tuesday, February 21, 2006 1:25 PM>> **Subject:** Re: Web Calculator for Gill Abstract

>>

>>

>> Nan/Drew

>> The link for the web calculator is up and running. You can now
connect

>> the URL which is

>> www accuratespda.gillabstract.swf to your website and it will work.

>> If any questions, call me at 914-760-0922

>> Tale care

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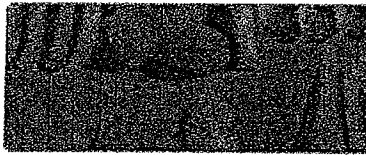
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under 1.5 yrs!This message is not flagged. [\[Flag Message - Mark as Unread \]](#)[Printable View](#)**From:** nangill@gillabstract.com [Add to Address Book](#) [Add Mobile Alert](#)**To:** drew@drewdiskin.com**Subject:** Re: Fw: Web Calculator for Gill Abstract**Date:** Wed, 22 Feb 2006 02:53:41 -0500

Thank you

N

----- Original Message -----

From: <drew@drewdiskin.com>

To: <nangill@gillabstract.com>

Sent: Tuesday, February 21, 2006 9:50 PM

Subject: Re: Fw: Web Calculator for Gill Abstract

>

> Updated.

>

> Drew

>

>

>

>> Drew

>> Please get this one up as quickly as possible and the other one off.

>> Thank you,

>> Nan

>> ----- Original Message -----

>> From: SKCC@aol.com

>> To: nangill@gillabstract.com

>> Cc: drew@drewdiskin.com

>> Sent: Tuesday, February 21, 2006 1:25 PM

>> Subject: Re: Web Calculator for Gill Abstract

>>

>>

>> Nan/Drew

>> The link for the web calculator is up and running. You can now connect

>> the URL which is

>> www accuratespda.gillabstract.swf to your website and it will work.

>> If any questions, call me at 914-760-0922

>> Tale care

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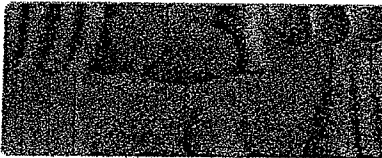
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To: SKCC@aol.com

CC: drew@drewdiskin.com

Subject: Re: Web Calculator for Gill Abstract

Date: Mon, 20 Feb 2006 12:33:18 -0500

Thanks Sal,
Just let Drew know also so he can link it.
Nan

----- Original Message -----

From: SKCC@aol.com

To: nangill@gillabstract.com

Cc: drew@drewdiskin.com

Sent: Monday, February 20, 2006 8:30 AM

Subject: Re: Web Calculator for Gill Abstract

Nan

You will not be able to view what the calculator looks like till sometime tomorrow, Tuesday. I will email you when it is up, then you can look at it and let me know if you like it, then your programmer can link it immediately.

Thanks
Sal

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4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

INVOICE #: 5453
 DATE: February 23, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

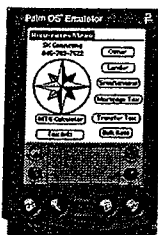
Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	Accurates Website Software – Setup Fee	\$799.00	\$799.00
	\$35 per month Main. Fee		
SUBTOTAL SALES TAX @ 08125% SHIPPING & HANDLING TOTAL DUE			\$799.00 \$64.91 N/C \$863.91

Make all checks payable to **SK Consulting**
 If you have any questions concerning this invoice, contact **Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM**

THANK YOU FOR YOUR BUSINESS!

SK Consulting**INVOICE****Accu-Rates**

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 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

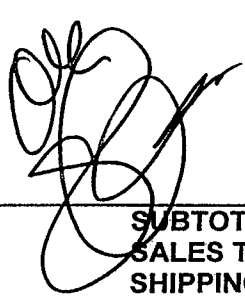
DATE: March, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	March Monthly Website Maintenance Fee	\$35.00	\$35.00
			
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to **SK Consulting**If you have any questions concerning this invoice, contact **Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM****THANK YOU FOR YOUR BUSINESS!**

SK Consulting**Accu-Rates****INVOICE**

4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

DATE: April, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	April Monthly Website Maintenance Fee	\$35.00	\$35.00
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to **SK Consulting**If you have any questions concerning this invoice, contact **Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM****THANK YOU FOR YOUR BUSINESS!**

SK Consulting**INVOICE****Accu-Rates**

4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM


DATE: May, 2006

Bill To:
Name : Nan Gill
Company : Gill Abstract Corp.
Address : 222 Greenwich Ave.
City, State ZIP : Goshen, NY 10924
Phone :

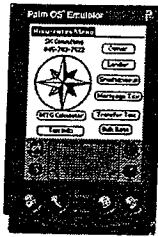
Ship To:
Name :
Company :
Address :
City, State ZIP :
Phone :

Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	May Monthly Website Maintenance Fee	\$35.00	\$35.00
			
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to **SK Consulting**If you have any questions concerning this invoice, contact **Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM****THANK YOU FOR YOUR BUSINESS!**

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 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

DATE: June, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	June Monthly Website Maintenance Fee	\$35.00	\$35.00
SUBTOTAL SALES TAX @ 08125% SHIPPING & HANDLING TOTAL DUE			\$35.00 \$2.84 N/C \$37.84

Make all checks payable to **SK Consulting**
 If you have any questions concerning this invoice, contact Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM

THANK YOU FOR YOUR BUSINESS!

SK Consulting**INVOICE****Accu-Rates**

4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

DATE: July, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

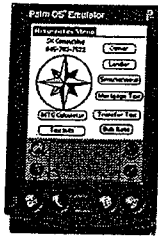
Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	July Monthly Website Maintenance Fee	\$35.00	\$35.00
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to **SK Consulting**
 If you have any questions concerning this invoice, contact **Sal Cimaglia**, 845-783-7522, E-Mail: SKCC@AOL.COM

THANK YOU FOR YOUR BUSINESS!

SK Consulting**Accu-Rates****INVOICE**

4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

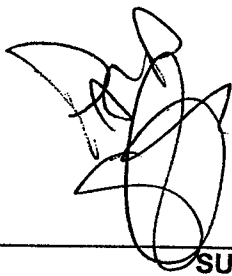
DATE: August, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	August Monthly Website Maintenance Fee	\$35.00	\$35.00
			
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to SK Consulting

If you have any questions concerning this invoice, contact Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM

THANK YOU FOR YOUR BUSINESS!

SK Consulting**Accu-Rates****INVOICE**

4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

DATE: September, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	September Monthly Website Maintenance Fee	\$35.00	\$35.00
SUBTOTAL SALES TAX @ 08125% SHIPPING & HANDLING TOTAL DUE			\$35.00 \$2.84 N/C \$37.84

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THANK YOU FOR YOUR BUSINESS!

SK Consulting**INVOICE****Accu-Rates**

4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

DATE: October, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

Comments or Special Instructions: None

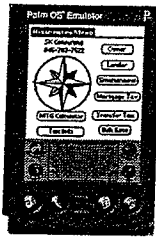
SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill	Best Way		Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	October Monthly Website Maintenance Fee	\$35.00	\$35.00
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to **SK Consulting**

If you have any questions concerning this invoice, contact Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM

THANK YOU FOR YOUR BUSINESS!

SK Consulting**Accu-Rates****INVOICE**

4 Cregan Place
 Monroe, New York 10950-9775
 Phone 845-783-SKCC (7522) E-Mail: SKCC@AOL.COM

DATE: November, 2006

Bill To:
 Name : Nan Gill
 Company : Gill Abstract Corp.
 Address : 222 Greenwich Ave.
 City, State ZIP : Goshen, NY 10924
 Phone :

Ship To:
 Name :
 Company :
 Address :
 City, State ZIP :
 Phone :

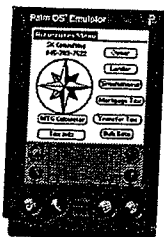
Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill			Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	November Monthly Website Maintenance Fee	\$35.00	\$35.00
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to SK Consulting
 If you have any questions concerning this invoice, contact Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM

THANK YOU FOR YOUR BUSINESS!



INVOICE

DATE: December, 2006

Ship To:
Name :
Company :
Address :
City, State ZIP :
Phone :

Comments or Special Instructions: None

SALESPERSON	P.O. NUMBER	ORDERED BY	SHIP VIA	F.O.B. POINT	TERMS
Sal Cimaglia		Nan Gill			Due on receipt

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	December Monthly Website Maintenance Fee	\$35.00	\$35.00
SUBTOTAL			\$35.00
SALES TAX @ 08125%			\$2.84
SHIPPING & HANDLING			N/C
TOTAL DUE			\$37.84

Make all checks payable to SK Consulting
If you have any questions concerning this invoice, contact **Sal Cimaglia, 845-783-7522, E-Mail: SKCC@AOL.COM**

THANK YOU FOR YOUR BUSINESS!

JAN. 6. 2007 12:39PM

NO. 704 P. 16/16

GILL ABSTRACT CORPORATION
222 Greenwich Avenue, P.O. Box 1
Goshen, New York 10924
(845) 294-6972
(845) 294-8748 (FAX)

EXHIBIT F

February 21, 2006

John Granger
2820 Audubon Village Drive, Suite 339
Audubon, Pennsylvania 19403

Re: Rates Calculator

Dear Mr. Granger:

We are in receipt of your letter dated 2/13/06 in reference to the rates calculator on our website.

This calculator was provided by our website Administrator. We never authorized him to use any copyrighted material and have instructed him to remove this calculator subject to investigation.

Very truly yours,
GILL ABSTRACT CORPORATION


Nan Mia Gill

NMG:sg

EXHIBIT B



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



Form TX

For a Nondramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TXu 1-310-009



EFFECTIVE DATE OF REGISTRATION

6-30-06

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼ New York Title Insurance Rate Calculator

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

a NAME OF AUTHOR ▼ John Allan Granger

DATES OF BIRTH AND DEATH
Year Born ▼ 1959 Year Died ▼

Was this contribution to the work a "work made for hire"?
☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country: USA
OR
Citizen of: USA
Domiciled in:

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼ Computer program

b

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country:
OR
Citizen of:
Domiciled in:

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

c

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country:
OR
Citizen of:
Domiciled in:

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED
*1998 2002 This information must be given ONLY if this work has been published.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
Complete this information ONLY if this work has been published. Month Day Year

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼ John Allan Granger

2820 Audubon Village Drive, Suite 339
Audubon, Pennsylvania 19403

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED
JUN 30 2006
ONE DEPOSIT RECEIVED
JUN 30 2006
TWO DEPOSITS RECEIVED
FUNDS RECEIVED

See instructions before completing this space.

MORE ON BACK ▶

• Complete all applicable spaces (numbers 5-9) on the reverse side of this page.
• See detailed instructions.
• Sign the form at line 8.

DO NOT WRITE HERE
Page 1 of 2 pages

*Amended by C.O. from phone call to John Granger on August 29, 2006.

EXAMINED BY <u> </u>	FORM TX
CHECKED BY <u> </u>	
<input type="checkbox"/> CORRESPONDENCE	
<input type="checkbox"/> Yes	
FOR COPYRIGHT OFFICE USE ONLY	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼

a. ☐ This is the first published edition of a work previously registered in unpublished form.

b. ☐ This is the first application submitted by this author as copyright claimant.

c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ►

Year of Registration ►

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

a 6

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

b See instructions before completing this space.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

John Allan Granger

2820 Audubon Village Drive, Suite 339

Audubon, Pennsylvania 19403

Area code and daytime telephone number ►

Email ► jg@alphaadv.net (610) 929-5154

Fax number ►

b

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ►

☒ Author

☐ other copyright claimant

☐ owner of exclusive right(s)

☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

8

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

John Allan Granger

Date ► 6/27/2006

Handwritten signature (X) ▼

X

John Allan Granger

Certificate will be mailed in window envelope to this address:

Name ▼	John Allan Granger
Number/Street/Apt ▼	2820 Audubon Village Drive, Suite 339
City/State/ZIP ▼	Audubon, Pennsylvania 19403

YOU MUST:
• Complete all necessary spaces
• Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:
Library of Congress
Copyright Office - TX
101 Independence Avenue, S.E.
Washington, D.C. 20559-6322

Fee is subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-9000.

9

*17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.